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May 13, 2021

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: South Carolina Office of Regulatory Staff's Motion to Solicit Comments from Utilities and Other Interested Stakeholders Regarding Measures to be Taken to Mitigate Impacts of Threats to Safe and Reliable Utility Service;
Docket No: 2021-66-A

Dear Ms. Boyd:

As you are aware, the Commission opened the above-referenced docket relating to a request from Governor Henry McMaster for ORS to undertake a comprehensive review of the State's public and private power grid in order to evaluate its ability to withstand potential ice storms and other dangerous winter weather conditions. By this letter, I am writing to inform the Commission and the parties of record to this proceeding that ORS recently engaged Guidehouse, Inc.¹ ("Guidehouse") as a third-party consultant to assist with this comprehensive review and evaluation. In the coming weeks and months, Guidehouse will begin its analyses and assessments of South Carolina's electric and natural gas systems with the goal of producing a draft report by September 30, 2021, and a final report by December 31, 2021.

ORS notes that Guidehouse previously has been engaged by various utilities to perform the following scopes of works that ORS believes should be disclosed in the interest of full disclosure and transparency:²

- Guidehouse worked with Duke Energy Florida to develop a 10-year Storm Protection plan and a 3-year Electric System transformation plan that was filed with the Florida PSC in

¹ In 2019, Guidehouse LLP acquired Navigant Consulting, Inc. ("Navigant") and subsequently renamed Navigant as Guidehouse, Inc.

² This list is not intended to be an exhaustive list of all consulting services provided by Guidehouse to public utilities, but rather to reflect the information disclosed by Guidehouse and gathered by ORS following a reasonable review of matters before the Commission.

2020. Guidehouse reported that it incorporated weather and climate data into scenario models, identified asset vulnerabilities, and prioritized asset investments.

- Duke Energy Florida tasked Guidehouse to assess the state of its Major Storm Data collection process with the stated goal of driving improvements and efficiencies.
- In Docket Nos. 2019-182-E, 2020-229-E, and/or 2021-2-E, Margot Everett and Scott Robinson testified on behalf of Dominion Energy South Carolina, Inc. ("DESC") regarding Net Energy Metering and other matters pertaining to solar generation and the value of solar.
- In Docket No. 2019-365-E, Laura Manz and Dean Koujak, Directors for Guidehouse, testified on behalf of DESC regarding the interconnection and integration of energy relating to a competitive procurement of renewable energy process.
- In Docket No 2019-326-E and relevant to Order No. 2020-825, Guidehouse advised DESC regarding Queue Reform and other potential changes to the South Carolina Generation and Interconnection Procedures. Guidehouse also facilitated meetings between DESC and external stakeholders regarding Queue Reform.
- Guidehouse has served as a consultant for Duke Energy Progress, LLC and/or Duke Energy Carolinas, LLC in matters relating to solar generation and in matters before the Federal Energy Regulatory Commission regarding the Southeast Energy Exchange Market.

ORS determined that Guidehouse's work related to these matters was sufficiently distinct from the issues presented in Docket No. 2021-66-A such that there is not a substantial conflict that would disqualify it from conducting an analysis of South Carolina's power grid as requested by Governor McMaster. Moreover, Guidehouse has supported analyses, provided advisory services, and given testimony on behalf of public service commission staffs in matters related to rulemaking and other commission determinizations in jurisdictions outside of South Carolina. Even so, Guidehouse has agreed to exclude any personnel from providing expert testimony before the Commission if they have previously performed work in grid resiliency for South Carolina utilities within the past three (3) years, including those identified above. With these protections in place and given Guidehouse's experience in matters pertaining to electrical and natural gas systems, ORS therefore has concluded that Guidehouse is well-qualified to perform the scopes of work required to investigate the issues presented in the above-referenced docket.

By copy of this letter, I am serving all parties of record to this matter. Thank you for your assistance with this matter.

Sincerely,

s/Benjamin P. Mustian
Benjamin P. Mustian

cc: All Parties of Record
David Butler, Esquire

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021-66-A

IN RE: South Carolina Office of Regulatory Staff's)
 Motion to Solicit Comments from Utilities) **CERTIFICATE**
 and Other Interested Stakeholders Regarding) **OF SERVICE**
 Measures to be Taken to Mitigate Impacts)
 of Threats to Safe and Reliable Utility Service)
 _____)

This is to certify that I, Kristy L. Hatem, have this date served one (1) copy of the **South Carolina Office of Regulatory Staff's Letter dated May 13, 2020**, in the above-referenced matter to the person(s) named below by causing said copy to be electronically mailed, addressed as shown below:

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/s/Kristy L. Hatem
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May 13, 2021